

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

PAUL HASTINGS LLP  
Kris Hansen (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
(212) 318-6400

-and-

Matthew M. Murphy (admitted *pro hac vice*)  
Matthew Micheli (admitted *pro hac vice*)  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
(312) 499-6018

COLE SCHOTZ P.C.  
Court Plaza North  
25 Main Street, P.O. Box 800  
Hackensack, New Jersey 07602-0800  
Michael D. Sirota (NJ Bar No. 014321986)  
Warren A. Usatine (NJ Bar No. 025881985)  
Seth Van Aalten (admitted *pro hac vice*)  
Justin Alberto (admitted *pro hac vice*)  
(201) 489-3000

PARKINS & RUBIO LLP  
Lenard M. Parkins (admitted *pro hac vice*)  
Charles M. Rubio (admitted *pro hac vice*)  
700 Milam, Suite 1300  
Houston, Texas 77002  
(713) 715-1666

*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT, LLC<sup>1</sup>,

Debtor.

Case No. 23-12825

Chapter 11

Judge: Michael B. Kaplan

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**APPLICATION FOR *PRO HAC VICE* ADMISSION OF MICHAEL WHALEN**

The Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”), by and through its undersigned counsel, Cole Schotz P.C., respectfully submits this application (the “Application”) for the *pro hac vice* admission of Michael Whalen, and represents as follows:

1. On April 4, 2023, the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the above captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey.

2. Michael Whalen, an associate at the firm of Paul Hastings LLP, represents the AHC of Supporting Counsel in connection with this matter. Because of his familiarity with the facts and circumstances relevant to the AHC of Supporting Counsel in this matter, the AHC of Supporting Counsel requests that Mr. Whalen be allowed to appear *pro hac vice* in this case.

3. As set forth in the Certification of Mr. Whalen, annexed hereto as **Exhibit A**, Mr. Whalen is a member in good standing of the bar of the State of Illinois, the U.S. Court of Appeals for the 6th Circuit, the U.S. Court of Appeals for the 7th Circuit, the U.S. District Court for the Northern District of Illinois, and the U.S. District Court for the Eastern District of Michigan. Mr. Whalen is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Whalen has represented that he will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant the AHC of Supporting Counsel's Application, pursuant to D.N.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel *pro hac vice* in the above captioned matter.

Respectfully submitted,

COLE SCHOTZ P.C.  
Attorneys for the Ad Hoc Committee of  
Supporting Counsel

By: /s/ Michael D. Sirota  
Michael D. Sirota

Date: May 16, 2023